

1 RISHI N. SHARMA (Cal. State Bar No. 239034)
2 PETER A. COOPER (Cal. State Bar No. 275300)
3 PAUL HASTINGS LLP
4 55 Second Street, 24th Floor
5 San Francisco, California 94105
6 Telephone: (415) 856-7000
7 Facsimile: (415) 856-7100
8 rishisharma@paulhastings.com
9 petercooper@paulhastings.com

10 Attorneys for Plaintiff
11 Paul A. Redd, Jr.

12 KAMALA D. HARRIS
13 Attorney General of California
14 DANIELLE F. O'BANNON
15 Supervising Deputy Attorney General
16 TRACE O. MAIORINO
17 Deputy Attorney General
18 SHARON A. GARSKE
19 Deputy Attorney General
20 State Bar No. 215167
21 455 Golden Gate Avenue, Suite 11000
22 San Francisco, CA 94102-7004
23 Telephone: (415) 703-5975
24 Fax: (415) 703-5843
25 E-mail: Sharon.Garske@doj.ca.gov

26 Attorneys for Defendant
27 Michael D. Daley

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1 UNITED STATES DISTRICT COURT
2
3 NORTHERN DISTRICT OF CALIFORNIA
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5 PAUL A. REDD, JR.,

6 No. C 98-20429 EMC

7 Plaintiff,

8 **JOINT STIPULATION AND [PROPOSED]
9 ORDER TO CONTINUE DISCOVERY
10 CUT OFF DATES**

11 vs.

12 MICHAEL D. DALEY,

13 Defendant.

JOINT STIPULATION

Pursuant to Local Rule 6-2, Plaintiff Paul A. Redd, Jr. and Defendant Michael D. Daley, by and through their respective counsel of record, hereby jointly stipulate and respectfully request the Court enter an order as follows:

1. On October 20, 2014, the Court issued its Case Management and Pretrial Order for Jury Trial (ECF 234). In the Order, the Court set the following discovery deadlines:

- Non-expert discovery cut off: December 4, 2014
- Opening expert reports: December 4, 2014
- Rebuttal expert reports: December 26, 2014
- Expert discovery cut off: January 15, 2015

2. Since the Court's order, the parties have engaged in discussions regarding settlement of Plaintiff's claims and scheduling discovery so as not to prejudice their direct settlement discussions.

3. Accordingly, in order for the parties to explore fully the possibility of settlement of this action, the parties' respectfully request that the Court continue the discovery deadlines as follows:

- Non-expert discovery cut off: February 2, 2015
- Opening expert reports: February 2, 2015
- Rebuttal expert reports: February 23, 2015
- Expert discovery cut off: March 9, 2015

4. The filing of this stipulation does not affect the other case management deadline set by the Court in the October 20, 2014, Order, including the trial and pre-trial dates.

Dated: November 24, 2014

RISHI N. SHARMA
PETER A. COOPER
PAUL HASTINGS LLP

By: s/ Peter A. Cooper
Peter A. Cooper
Attorneys for Plaintiff Paul A. Redd, Jr.

Dated: November 24, 2014

TRACE O. MAIORINO
SHARON A. GARSKE
CALIFORNIA ATTORNEY GENERAL'S OFFICE

By: s/ Sharon A. Garske
Sharon A. Garske
Attorneys for Defendant Michael D. Daley

**JOINT STIPULATION & ORDER TO CONTINUE
DISCOVERY CUT OFF DATES
U.S.D.C., N.D. Cal., No. C 98-20429 EMC**

ORDER

On the stipulation of the parties, and good cause appearing therefor,

IT IS ORDERED that the discovery deadlines set in the October 20, 2014, Case Management and Pretrial Order for Jury Trial (ECF 234) be and hereby are continued as follows:

- Non-expert discovery cut off: February 2, 2015
- Opening expert reports: February 2, 2015
- Rebuttal expert reports: February 23, 2015
- Expert discovery cut off: March 9, 2015

IT IS FURTHER ORDERED that no other case management deadlines are otherwise affected by this order.

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Dated: November __, 2014

